

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:)
) CASE NO. 21-00345-jw
Carol Lynne Myers)
1347 Valley Road) CHAPTER 13
Charleston, SC 29412)
SSN xxx-xx-3876)
DEBTOR.)
_____)

OBJECTION TO CREDITOR'S MOTION TO DISMISS

The above-referenced debtor, thorough her undersigned attorney, hereby objects to Creditor's Motion to Dismiss. The debtor is informed and believes that Creditor failed to articulate a claim upon which the relief requested can be granted. Creditor relies upon 11 U.S.C. Section 1307 in seeking dismissal of the case. Section 1307 allows dismissal for cause for including failure to commence making timely payments and material default by the debtor with respect to a term of a confirmed plan. The debtor is informed and believes that she is in compliance with the terms of her confirmed plan and therefore her case should not be dismissed.

WHEREFORE, the debtor prays that the court deny the Creditor's Motion to Dismiss as well as any further relief the court deems just and proper.

Date: 8/24/21

BY: 

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